

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

**DEFENDANT'S NOTICE TO THE COURT REGARDING THE SCHEDULING OF TIA
ROBINSON-COOPER'S DEPOSITION AND OTHER CASE DEADLINES**

Defendant, Ivy Tech Community College of Indiana (“Defendant”), by counsel, pursuant to the Court’s December 3, 2024 Order (Dkt. 39), submits its Notice to the Court Regarding the Scheduling of Tia Robinson-Cooper’s Deposition and Other Case Deadlines.¹

1. Pending this Court's approval, Counsel for the Parties and Dr. Robinson-Cooper have agreed to reschedule Dr. Robinson-Cooper's deposition for December 19, 2024.

2. The Parties are in the process of rescheduling the mediation in this matter that was originally set for Friday, December 6, 2024, pending this Court's extension of the deadline to mediate. Based on the availability of the Parties and mediator, C. Erik Chickedantz, the Parties anticipate that the mediation will be rescheduled for January 6 or 7, 2025.

3. The undersigned counsel for Defendant has conferred with Plaintiff's counsel, Jay Meisenhelder ("Mr. Meisenhelder"), and Mr. Meisenhelder has stated that Plaintiff will cooperate with Defendant to ensure that the deposition and mediation are completed as soon as possible.

¹ Defendant notes that it previously filed a response to Dr. Tia Robinson-Cooper's ("Dr. Robinson-Cooper") Non-Party Motion to Quash Subpoena to Non-Party to Testify at a Deposition in a Civil Matter. (See Dkt. 38.)

4. Mr. Meisenholder indicated that he preferred to file a separate notice in response to the Court's December 3, 2024 Order (Dkt. 39), as Plaintiff intends to file a separate motion concurrently with her notice.

5. Pursuant to N.D. Ind. L.R. 7-1, Defendant plans to file a Motion for an Award of Costs and Attorneys' Fees moving the Court for an Order sanctioning Dr. Robinson-Cooper for her failure to appear for her deposition in the form of the monetary amount of costs and attorneys' fees incurred by Defendant due to Dr. Robinson-Cooper's failure to appear. Defendant will file its motion as soon as practicable.

6. Based on the date of the rescheduled deposition (December 19, 2024) and anticipated date of the rescheduled mediation (January 6 or 7, 2025), Defendant respectfully requests that the Court extend (1) the deposition to depose Dr. Robinson-Cooper to December 19, 2024; (2) the deadline to engage in mediation to January 10, 2025; and (3) the deadline for the Parties to file any dispositive motions to January 31, 2025.

Respectfully submitted,

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